

1 FILED ENTERED
2 LODGED RECEIVED
3

The Honorable Dean Brett

2 JUL 08 2014
3

4 AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON
DEPUTY
5
6

7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

NO. MJ 14-282

11 Plaintiff,

COMPLAINT FOR VIOLATION
Title 18, United States Code, Section 1073

12 v.
13

14 ALI MUHAMMAD BROWN,

15 Defendant.

16
17 BEFORE the Honorable Dean Brett, United States Magistrate Judge, U.S.
Courthouse, Seattle, Washington.

18
19 The undersigned complainant being duly sworn states:

20
21 **COUNT 1**
(Flight to Avoid Prosecution)

22
23 On or about June 1, 2014, at Seattle, within the Western District of Washington,
the defendant, ALI MUHAMMAD BROWN, did move and travel in interstate commerce
from Seattle, State of Washington, to the State of New Jersey, with the intent to avoid
prosecution under the laws of the State of Washington for the crime of Aggravated
Murder in the First Degree, which is a felony under the laws of the State of Washington.
24
25
26
27
28

COMPLAINT/BROWN - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 All in violation of Title 18 United States Code, Section 1073.

2 The undersigned Complainant, Randy Moore, being duly sworn, further deposes
3 and states as follows:

4 1. I am a Special Deputy with the United States Marshals Service, having
5 been so employed since 2001, and as such am vested with the authority to investigate
6 violations of Federal laws, including Title 18, United States Code, Section 1073. I am a
7 Seattle Police Detective presently assigned to the U.S. Marshals Service sponsored
8 Pacific Northwest Violent Offender Task Force in the Western District of Washington.
9 The following is information developed during my investigation, and also information
10 provided to me by other law enforcement sources.

11 2. On July 1, 2014, Ali Muhammad BBROWN was charged in the King
12 County Superior Court for violation of Revised Code of Washington 9A.30.030,
13 Aggravated Murder in the First Degree (2 counts) under Cause #14-1-03028-9. An arrest
14 warrant was issued for his arrest. This case has been adopted by the Pacific Northwest
15 Violent Offender Task Force, and I am assigned as the primary fugitive investigator.

16 3. According to Seattle Police Homicide Detective Cloyd Steiger, on June 1,
17 2014, BROWN fatally shot the two unarmed victims multiple times with a 9mm
18 handgun. BROWN's palm print was found on the interior of the rear driver's side
19 window which was matched to BROWN by fingerprint technicians. During the
20 subsequent investigation, BROWN's wife, L.W. told investigators that her Smith &
21 Wesson M&P 9mm handgun was missing and that she believed that BROWN had taken
22 it.

23 4. During the course of this fugitive investigation I was able to determine that
24 BROWN left the State of Washington soon after the murders on June 1, 2014, and
25 traveled to the State of New Jersey.

26 5. On June 25, 2014, the West Orange, New Jersey Police Department
27 responded to a murder which had occurred in the area of Northfield Avenue & Walker
28

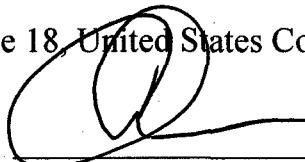
1 Road. The unarmed victim had been shot numerous times with a 9mm handgun while he
2 was in the driver's seat of his vehicle. Subsequent analysis of the shell casings at the
3 murder scene resulted in a ballistic match to the shell casings found at the Seattle murder
4 scene. As of this date, BROWN has not yet been charged in this crime.

5 6. On June 29, 2014, the Point Pleasant Beach, New Jersey Police Department
6 responded to an armed robbery which had just occurred at a downtown coffee shop. In
7 this crime, BROWN approached the victim outside the coffee shop and demanded his
8 money and car keys. The victim ran inside the shop, and BROWN chased him inside and
9 pointed a 9mm handgun at the victim and again demanded his money and keys. The
10 victim complied, and BROWN fled the shop and attempted to steal the victim's car.
11 However, the vehicle was a manual transmission and BROWN's attempt to drive it away
12 failed. BROWN fled on foot and abandoned his backpack. Investigating officers found
13 documents inside the backpack indicating that it belonged to BROWN. Also inside the
14 backpack, detectives found a fully loaded 9mm magazine for a Smith & Wesson M&P
15 handgun. Point Pleasant Beach Police Detectives researched the name of "Ali BROWN"
16 and discovered that he was a suspect in the Seattle Police Murder investigation, and then
17 notified Detective Steiger that BROWN was in New Jersey. BROWN was also identified
18 by photo montage as the assailant by the robbery victim and other witnesses at the coffee
19 shop scene.

20 7. Further investigation by the Point Pleasant Beach detectives revealed that
21 on June 28, 2014, BROWN attempted to pay for a meal at a local restaurant with a bad
22 check. BROWN offered to call his brother, A.F. to pay for the meal by credit card, which
23 he did. BROWN called his brother's Seattle cell phone number and the bill was paid to
24 the restaurant manager over the phone. BROWN identified himself to the restaurant
25 manager as "Ali BROWN". Surveillance video was obtained from the restaurant, and the
26 images on the camera match known photos of Ali Muhammad BROWN.

27 8. Based on the above facts, I respectfully submit that there is probable cause
28 to believe that Ali Muhammad BROWN did travel to New Jersey and traveled there to

1 avoid prosecution in the State of Washington for Aggravated Murder, and therefore there
2 is probable cause to believe that Ali Muhammad BROWN committed the offense of
3 Flight to Avoid Prosecution, in violation of Title 18, United States Code, Section 1073.



5
6 Randy Moore,
7
8 Special Deputy, US Marshals Service
9
10
11
12

13 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
14 presence, the Court hereby finds that there is probable cause to believe the Defendant
15 committed the offense set forth in the Complaint.

16 Dated this 8 day of July, 2014.
17
18



19
20 DEAN BRETT
21
22 United States Magistrate Judge
23
24
25
26
27
28